

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF OHIO  
WESTERN DIVISION

**Allied Construction Industries,** : Case No. 1:14-cv-00450-MRB  
:   
**Plaintiff,** :   
v. :   
**City of Cincinnati,** :   
**Defendant.** :   
:   
:

**DECLARATION OF DALE BELMAN IN SUPPORT OF INTERVENOR**

**LOCAL 265'S MOTION FOR SUMMARY JUDGMENT**

I, Dale Belman, hereby declare that:

1. I am a tenured full professor at the School of Labor and Industrial Relations at Michigan State University in East Lansing, Michigan. I have been a member of the faculty at Michigan State University for fifteen (15) years. Prior to that, I was a member of the economics department faculty at the University of Wisconsin, Milwaukee for fifteen (15) years. I earned my doctorate in economics from the University of Wisconsin, Madison in 1986.

2. I have conducted extensive research in labor economics, construction employment relations, collective bargaining and the qualitative analysis of economic data and have published widely on these topics in peer-reviewed journals, books and monographs on construction.

3. I currently serve as President of the Institute for Construction Economics Research, a private non-profit that works with industry stakeholders on employment and economic issues confronting the construction industry. Previously, I served as the chairman of the Construction Economics Research Network, a National Institute of Occupational Safety and Health supported network of social scientists engaged in research on construction.

4. In 2014, I received Princeton University's William G. Bowen Award for the

Outstanding Book on Labor and Public Policy, which is presented to the book making the most important contribution toward understanding public policy related to industrial relations and the operation of labor markets.

5. I have worked with the Construction Users Round Table (“CURT”), discussed in my report, and entities associated with CURT, to improve construction demand forecasting. I have received a grant from the Annie E. Casey foundation and organized and hosted conferences on improving construction demand forecasting that were attended by major construction stakeholders including owners such as Southern Power and DuPont, construction companies such as Fluor Construction and Chicago Bridge & Iron, and large employer associations.

6. In conducting studies and drafting publications as detailed in my report and curriculum vitae (Exhibit I to my report), I work regularly with construction project owners, construction contractors and labor organizations.

7. I was retained as an expert in this litigation by Local 265 of the Laborers International Union of North America. I was asked to prepare, and did prepare, an expert report that contains a statement of my opinions and the basis for them, the facts or data considered by me in forming my opinions, and the exhibits used to summarize or support my opinions. A true and correct copy of that report, with excerpts of exhibits, is attached hereto as **Exhibit A**.

8. The opinions and information contained in my report have not changed since the report was finalized and served on all parties. My report is consistent with my present opinions and the testimony that I would provide if called as a witness at trial.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge, and if called as a witness I could and would testify competently thereto.

Executed on December \_\_\_\_, 2015, at East Lansing, Michigan.

**[SEE NEXT PAGE FOR DATE AND SIGNATURE]**

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DALE BELMAN

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Executed on December 19<sup>th</sup>, 2015, at East Lansing, Michigan.

  
DALE BELMAN

**CERTIFICATE OF SERVICE**

I hereby certify that on December 18, 2015, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the following:

Kevin R. McDermott  
Barnes & Thornburg LLP  
41 South High Street, Suite 3300  
Columbus, Ohio 43215  
kmcdermott@btlaw.com

Terry Nestor  
Scott Crowley  
City of Cincinnati  
801 Plum Street, Room 214  
Cincinnati, Ohio 45202  
terry.nestor@cincinnati-oh.gov  
scott.crowley@cincinnati-oh.gov

*/s/ Jolene E. Kramer*

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*JOLENE E. KRAMER, pro hac vice  
Co-Counsel for Intervenor Local 265*

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